

To "Wood, Thomas" <TRWOOD@stoel.com>

cc gyee@arb.ca.gov, kathi.hann@BHPBilliton.com, Renee.Klimczak@BHPBilliton.com, Rick.Abel@BHPBilliton.com, tumenhofer@entrix.com, Laura

bcc

Subject Re: Sause Brothers Report

Please see attached questions from the Region 9 Air Permits office:



Boat ERC's Comments.doc

Margaret Alkon Assistant Regional Counsel U.S. EPA, Region IX Direct Dial: (415) 972-3890 Fax: (415) 947-3570

"Wood, Thomas" <TRWOOD@stoel.com>



"Wood, Thomas" <TRWOOD@stoel.com> 05/09/2006 06:48 PM

To Margaret Alkon/R9/USEPA/US@EPA, gyee@arb.ca.gov

cc Renee.Klimczak@BHPBilliton.com, Rick.Abel@BHPBilliton.com, tumenhofer@entrix.com, kathi.hann@BHPBilliton.com

Subject Sause Brothers Report

Margaret/Gary: Attached is the report documenting the NOx reductions anticipated from the Sause Brothers tug repower project. As you will note, we anticipate that there will be 139 tons per year of NOx reduction in California Coastal Waters, of which 77 tons per year will occur in the tri-county area (i.e., Santa Barbara, Ventura and Los Angeles). This project alone is more than adequate to mitigate the 67 tons per year of NOx emissions attributable to the stationary source. As you will note, the project will also result in reductions of 5 tons per year of diesel particulate.

I have included the report as a separate file from the attachments. Please contact me if you have any questions about the report or the emissions reduction documentation. As I indicated earlier today, I hope that we will have the Olympic repower report to you next week.

Thomas R. Wood Stoel Rives LLP

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Klihyam Repower Report Attachments--5-9-06.pdf Klihyam Repower Report--5-9-06.pdf

M/V Klihyam Repower Project

EPA has reviewed the materials provided for this project. The following is a list of questions / requests for additional information required to complete our evaluation.

- 1. Attachment A, Section A. Trips Logs Summary:
 - a. How were the distances of each jurisdiction determined?
- 2. Attachment A, Section E.1. Line Trip Hauls:
 - a. A note is provided which states that the trip on Dec. 16 took 115 hours due to a weather delay.
 - i. Please clarify if these 115 hours are included or excluded from the summary.
 - ii. Were the engines operating at 97% load during all 115 hours?
 - b. What time period is covered for the trips listed on the table?
 - c. Should the trip listed in the table from Martinez to Richmond be listed with E.3., rather than E.1.?
- 3. Attachment C, faxed copy of Electro-motive diesel emissions data sheet:
 - a. The date on the memo providing the emission data is 2/14/92, but the current engines were installed in 2004. It would seem that the emission data provided is out-of date.
 - b. EPA notes that the engine model # supplied on the data sheet when the boat was built is EMD 16-645-<u>E6</u>; 1950 HP @ 900 rpm. This model number is not listed on the emission data sheet. Please provide a copy of the correct emission data sheet for the existing engines.
- 4. Attachment D. Fuel Logs
 - a. What is the fuel tank capacity of the tug boat?
 - b. Do any other engines on the boat share this fuel (i.e. auxiliary engines)?
 - c. Is the fuel tank filled to capacity each time it is filled? If not, is there some standard target when refilling, e.g. 80-90% full?
 - d. To determine annual fuel usage, EPA suggests using the fuel data from 3/7/05 to 3/10/06.
 - e. The amount of fuel contained in the fuel tank on 3/10/06 should be deleted from the total fuel usage, as this amount represents a full tank, for which no travel has occurred.
 - f. Please provide copies of all fuel receipts list in Attachment D.
 - g. Please provide a copy of the fuel specification sheet for the fuel used.